UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Norfolk Division

RECOVERY LIMITED PARTNERSHIP, Plaintiff,

v. Civil Action No.: 2:87-cv-00363

UNIDENTIFIED, WRECKED AND ABANDONED SAILING VESSEL, etc.,
Defendant.

STATUS REPORT TO COURT

Recovery Limited Partnership (the "Plaintiff" or "RLP"), by counsel, respectfully submits this Report to the Court as salvor-in-possession of the wreck of the SS CENTRAL AMERICA ("SSCA"). Plaintiff has previously submitted twenty-two reports, two in Civil Action No. 2:14-cv-160, and twenty in Civil Action No. 2:87-cv-363. *See* D.E. # 21 and 90 (No. 2:14-cv-160); D.E. # 104, 130, 163, 175, 176, 177, 195, 202, 209, 233, 256, 264, 267, 273, 278, 280, 281, 289, 290, 291, 292 and 293 (No. 2:87-cv-363).

Since the last report, the Trustee has continued to work with salvage advisor Craig

Mullen on planning for the next salvage operation, which is now targeted for June or July of

2023.¹ In this regard, Mr. Mullen and the Trustee have been working to identify and evaluate

available salvage vessels, operators and salvage crew leaders. The Trustee anticipates presenting

a plan for salvage and request for approval to the Court on or before March 17, 2023.

1

{10787424: }

¹ The Trustee believes that the COVID-19 pandemic, while not fully resolved, should not be an impediment to salvage in 2023. The Center for Disease Control has updated its guidance for non-passenger commercial vessels and is not currently requiring pre-voyage quarantines or significant restrictions associated with disembarkation of sick or infected persons. *See* CDC Guidance for Maritime Vessels on the Mitigation and Management of COVID-19, available at https://www.cdc.gov/quarantine/maritime/covid-19-ship-guidance.html.

The Trustee is aware that exclusive jurisdiction over the salvage of the wreck of the S.S. Central America lies with this Court. He understands his obligation to notify this Court regarding any future salvage and will seek advance approval before any such salvage is performed in accordance with the Order entered January 11, 2019. D.E. # 276.

The Trustee and counsel are available to address any questions that the Court may have regarding this report.

This 14th day of November, 2022,

/s/ James L. Chapman, IV

James L. Chapman, IV, Esquire (VS. No. 21983) CRENSHAW, WARE & MARTIN, PLC. 150 West Main Street, Suite 1923

Norfolk, Virginia 23510

Telephone: (757) 623-3000 Facsimile: (757) 623-5735 jchapman@cwm-law.com

Conrad M. Shumadine (VS. No. 4325) Brett A. Spain (VS. No. 44567) WILLCOX & SAVAGE, P.C. 440 Monticello Avenue, Suite 2200 Norfolk, Virginia 23510

Telephone: (757) 628-5500 Facsimile: (757) 628-5569 <u>cshumadine@wilsav.com</u> <u>bspain@wilsav.com</u>

Counsel for Recovery Limited Partnership

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of November, 2022, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ELF system, which will then send a notification of such filing to all registered filers.

{10787424: }

/s/ James L. Chapman, IV

James L. Chapman, IV, Esquire (VS. No. 21983)

Counsel for Recovery Limited Partnership

CRENSHAW, WARE & MARTIN, PLC.

150 West Main Street, Suite 1923

Norfolk, Virginia 23510

Telephone: (757) 623-3000 Facsimile: (757) 623-5735 jchapman@cwm-law.com

{10787424: }